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UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MASSACHUSETTS
INA STEINER, DAVID STEINER, and) Case No. 1:21-CV-11181-PBS
STEINER ASSOCIATES, LLC,)
)
Plaintiffs,)
)
vs.)
)
EBAY, INC., et al.,)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF VERONICA L. ZEA

San Jose, California

Wednesday, September 11, 2024

REPORTED BY: Derek L. Hoagland

CSR No. 13445

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FOR THE DISTRICT COURT OF MASSACHUSETTS
INA STEINER, DAVID STEINER, and) Case No. 1:21-CV-11181-PBS
STEINER ASSOCIATES, LLC,)
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Plaintiffs,)
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EBAY, INC., et al.,)
)
Defendants.)
_____)

Videotaped Deposition of VERONICA L. ZEA, taken before
Derek L. Hoagland, a Certified Shorthand Reporter for
the State of California, commencing at 9:10 a.m.,
Wednesday, September 11, 2024, at Berliner Cohen LLP,
10 Almaden Blvd, 11th Floor, San Jose, California 95113.

1 Q. Do you have a college degree, Ms. Zea?

2 A. Yes.

3 Q. What -- from what university?

4 A. American University.

5 Q. And what was your degree?

6 A. Justice, law, and criminology. A bachelor's of
7 art.

8 Q. Okay. Bachelor of the Arts degree?

9 A. Mm-hmm.

10 Q. And what year did you graduate?

11 A. 2016.

12 Q. Was your role at eBay your first job after
13 college?

14 A. Yes.

15 Q. Were you an employee of eBay, or did you work
16 for another entity?

17 A. Another entity.

18 Q. Okay. After -- which entity were you hired by
19 for that role initially?

20 A. Concentric Advisors.

21 Q. What month and year were you hired?

22 A. That would be May 2017.

23 Q. Okay. And after you were hired by Concentric
24 Advisors in May of 2017, were you assigned to work in --
25 at eBay?

1 A. Yes.

2 Q. And where at eBay were you assigned to work?

3 A. At the time, it was called the Global Security
4 Operations Center or GSOC for short.

5 Q. Okay. Was that at eBay's campus in San Jose,
6 California?

7 A. Yes.

8 Q. What was your title when you started?

9 A. It was, I'm sorry, it's been so long. Security
10 operator, I think.

11 Q. Was it possible you were an intelligence
12 analyst?

13 A. Not at the time of hiring.

14 Q. Okay. Security operator was your title?

15 A. I believe so.

16 Q. You think so. Okay.

17 Did you start as an hourly employee or were you
18 paid via salary?

19 A. Hourly.

20 Q. And how much were you making at the start per
21 hour?

22 A. I believe it was \$20 an hour.

23 Q. \$20 an hour?

24 A. It might have been \$25 an hour.

25 Q. Okay.

1 A. Mm-hmm.

2 Q. How old were you when you started working at
3 eBay?

4 A. 23 years old.

5 Q. Did you have any prior experience working at a
6 large corporation?

7 A. No, I did not.

8 Q. Did you have any prior experience working in the
9 security industry?

10 A. No.

11 Q. Did you have any prior experience at all working
12 in a corporate office environment?

13 A. No.

14 Q. Have you had any prior jobs before working at
15 eBay?

16 A. Yeah, aside from babysitting, house-sitting,
17 et cetera, I was a ride attendant at Great America for a
18 roller coaster; and for a week, I was a temp at a law
19 firm filling in for someone.

20 Q. Okay. Thank you.

21 MS. MILLS: I am going to ask -- I am going to
22 show you what's been marked as Exhibit 1.

23 (Exhibit No. 1 marked for identification.)

24 (Off the record discussion.)

25 ///

1 BY MS. MILLS:

2 Q. Ms. Zea, do you recognize this as a letter that
3 you wrote to Judge William Young, submitted on January
4 2022, in connection your sentencing?

5 A. Yes.

6 Q. Did you write that letter?

7 A. Yes.

8 Q. Is that a true and correct copy of that letter?

9 A. I believe so.

10 Q. Okay.

11 A. Yes.

12 Q. And were you truthful and honest in that letter
13 that you wrote to the Court?

14 A. Yes.

15 Q. Okay. You can set that aside for now.

16 A. Okay.

17 Q. Who was the head of the security team at eBay
18 while you worked there?

19 A. Jim Baugh.

20 THE REPORTER: Jim?

21 THE DEPONENT: Baugh, B-a-u-g-h.

22 BY MS. MILLS:

23 Q. When did you first meet Mr. Baugh?

24 A. During my interview.

25 Q. Approximately how old was he at that time?

1 A. Alicia Doming [sic] -- I keep forgetting her
2 last name.

3 Q. Domingos?

4 A. Yeah, I think so.

5 Q. Okay. Did -- and she was your direct supervisor
6 at the time that you started, you think?

7 A. I think so, yes.

8 Q. Okay. And do you remember who Ms. Domingos
9 reported to at that time?

10 A. I think it was the man who previously held Jim
11 Baugh's position, Jim -- I think his name was also Jim,
12 and I am forgetting his last name. Yeah.

13 Q. Is it Haswell, maybe or Fussell?

14 A. Fussell.

15 Q. Fussell?

16 A. Mm-hmm.

17 Q. Okay. Did -- did there come a time when
18 Ms. Popp was your direct supervisor?

19 A. Yes.

20 Q. Okay. And roughly how long after you started
21 was that?

22 A. I believe that was about two months after I
23 started.

24 Q. Did Ms. Popp report directly to Mr. Baugh?

25 A. Yes.

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

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13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 Q. While you were working on eBay's campus, did you
19 tend to hang out with other eBay personnel not from the
20 security team?

21 A. No.

22 Q. Were you ever encouraged to interact with people
23 outside of the security team?

24 A. Not really, only if it was something that could
25 kind of benefit the security team. So like networking,

1 to try to build connections for the team itself.

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 Q. Okay. All right. When you first started
18 working at eBay in 2017, approximately how many other
19 members were on the security team at that time?

20 A. The whole security team? I am not sure.

21 Q. Okay.

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 Q. Okay. Did the -- and you yourself did not have
2 a background in intelligence gathering at that time,
3 right?

4 A. No.

5 Q. Okay. Did the firing of those other nine
6 analysts all in one fell swoop cause you any concern
7 about your own job?

8 A. Yes.

9 Q. Why?

10 A. Well, I had become friendly with those people,
11 and they had trained me, so first I was upset to see
12 them go, and I know losing a job can't be easy. But
13 also, yeah, it started to instill the fear of if it was
14 so easy to get rid of those people with the long history
15 in the office, you know, what makes me stand out?

16 Q. Did you need a job to pay your bills?

17 A. Yes.

18 Q. While you were a contractor working on eBay's
19 security team, what was your understanding as to whom
20 you were supposed to report any workplace incidents,
21 like harassment or other issues?

22 A. My contractor, the Concentric or PFC.

23 Q. Okay. Concentric when you first started?

24 A. Yes.

25 Q. And then later on your employment transitioned

1 to PFC?

2 A. Mm-hmm.

3 Q. And we will talk about that in a little bit.

4 A. Okay.

5 Q. Okay. Did you ever report any workplace
6 experiences that made you uncomfortable?

7 A. No, I -- so I will say I knew I could go -- or I
8 thought I could go to my contractor, the people who were
9 more embedded at the actual agencies, but I also would
10 report to people from Concentric or PFC at the eBay
11 office, and so it was them I would have to bring it to
12 first. If we went around those people, we would -- Jim
13 would find out and we would get in trouble. Yeah.

14 Q. Okay. You wrote in your sentencing letter about
15 an incident where a janitor tried to kiss you without
16 your consent and you reported that to Concentric.

17 Do you recall that?

18 A. Yes.

19 Q. Did that happen?

20 A. Mm-hmm.

21 Q. What happened after that?

22 A. I kind of told my -- I think -- I don't think
23 she was a manager, she was a shift lead with Concentric.
24 I told her, "Hey, this happened, and it was
25 uncomfortable." And it was just kind of laughed off,

1 and so I would start -- that was during the night shift
2 when I would work alone a lot. So I couldn't leave the
3 office, so I would still just be in there when he would
4 come in. Yeah, it wasn't addressed ever.

5 Q. Okay. And you also wrote in your letter to the
6 Court about having another incident during the night
7 shift where another analyst, male analyst started
8 telling you about his sex life in graphic detail?

9 A. Yeah.

10 Q. And you reported that to Concentric as well.
11 Do you recall that?

12 A. Yeah. They did hire someone to start working
13 night shift. They rehired enough people. And yeah, he
14 started to tell me about a date he went on, and it was
15 way too much information. And so again, I did tell the
16 shift lead who brought it up to I think Stephanie Popp
17 and Jim Baugh at the time, so I think Stephanie Popp was
18 still Concentric at the time. The shift lead definitely
19 was, but I don't think they took it further up the
20 Concentric chain from there.

21 Q. Okay. And you wrote in your letter to the Court
22 that Mr. Baugh and Ms. Popp reacted by chastising you
23 for telling your supervisor instead of going to
24 Ms. Popp.

25 Do you recall that?

1 A. Yeah.

2 Q. And you also stated that they told you never to
3 go to Concentric again about any issues that you had but
4 instead to take them to Ms. Popp.

5 Do you remember that?

6 A. Yes.

7 Q. And is that what happened?

8 A. Mm-hmm. Yes.

9 Q. What impact did that have on your work -- your
10 work life at eBay at that point?

11 A. At that point, yeah, it started to feel a little
12 like I was closed off from others. We would have
13 training sessions with Concentric, but Jim Baugh or
14 Stephanie Popp were always present, so there wasn't
15 really a time where we could voice any concerns or
16 something like that to someone not embedded at eBay.

17 Q. Okay. I believe you have testified about
18 Mr. Baugh referring to the team at times, the security
19 team, as "a family"?

20 A. Mm-hmm.

21 Q. Did Mr. Baugh ever insult you or other members
22 of that family?

23 A. Yes.

24 Q. Do -- do you recall specific instances where he
25 did that?

1 Q. So we've talked about the fact that at the
2 beginning of your time with eBay, you were employed by
3 Concentric Advisors?

4 A. Mm-hmm.

5 Q. That assigned you to work at eBay?

6 A. Mm-hmm.

7 Q. Did there come a time when that changed?

8 A. Yes.

9 Q. Approximately when was that?

10 A. January 2019.

11 Q. Okay. And so what happened that caused you to
12 no longer be working with Concentric Advisors?

13 A. In October 2018, I believe, it's kind of a long
14 story.

15 Q. That's fine.

16 A. One of my fellow analysts got tired. She was
17 frequently -- it seemed like targeted as being the one
18 on-call analyst, and she was the one that enjoyed
19 surfing, and it was really impacting her weekend and
20 time off with her boyfriend and friends.

21 Q. What was her first name?

22 A. Madeline.

23 Q. Okay.

24 A. And she came to work with what Jim was
25 calling -- or Baugh was calling an attitude. We had to

1 A. Yeah. Yeah.

2 Q. Okay. And did that series of events that you
3 have been talking about with Madeline and the Concentric
4 being severed or terminated --

5 A. Mm-hmm.

6 Q. -- did that happen around late 2018?

7 A. Yeah, I believe it was in October, late October
8 2018.

9 Q. Okay. And it was a new contracting company
10 eventually brought on board?

11 A. Yes.

12 Q. Who brought that company on board?

13 A. Jim Baugh.

14 Q. What was the name of the company?

15 A. Progressive F.O.R.C.E. Concepts, PFC.

16 Q. Okay. What did Mr. Baugh tell you about PFC?

17 A. He told us that they were kind of coming on as a
18 favor to him almost. They weren't typically in the
19 intelligence field. They were more physical security.
20 They typically hired ex-military or ex-police force
21 members, but that he knew the CEO of the company, and
22 that he was willing to onboard us and kind of just have
23 Jim Baugh be in charge of how we were managed and
24 everything.

25 And then, yeah, he said he was doing that so

1 Q. And so this --

2 A. Yeah.

3 Q. -- is the incident that Mr. Baugh then relayed
4 to you later on that that was the day that he had broken
5 you?

6 A. Mm-hmm.

7 Q. So he described that incident where you broke
8 down crying as a result of this incident, as the time he
9 had broken you?

10 A. Yes.

11 Q. Okay. Did Mr. Baugh say he had broken others on
12 your team?

13 A. Mm-hmm.

14 Q. Who did he describe that?

15 A. The one he specifically mentioned wasn't in the
16 GIC, but it was Dave Harville, like I said. Yeah.

17 Q. Okay. Dave Harville was a -- was he a
18 supervisor within the security team at eBay?

19 A. Yes.

20 Q. Okay. In July of 2019, did you go on a work
21 trip to Las Vegas with Mr. Baugh?

22 A. Yes.

23 Q. During that trip, did Mr. Baugh require you and
24 the other young women that you worked with to go to a
25 strip club?

1 A. Yes. Just myself and Stephanie Popp.

2 Q. Okay.

3 A. As the two women.

4 Q. Okay. What happened?

5 A. We were out to dinner as an entire security team
6 of the people that had attended eBay Open; and
7 afterwards, we were trying to figure out what to do.
8 And someone had mentioned a place called Spearmint
9 Rhino, I think, and so I repeated it, and then Jim said,
10 "Oh, you want to go there?"

11 And we ended up all Ubering there, and I had
12 never been to a place like that, and I was just --

13 Q. Did you know what it was when you were -- when
14 you said the name?

15 A. When -- yeah, someone told me.

16 Q. Okay. When you said that name, was -- were you
17 expressing to Mr. Baugh that you wanted to go there or
18 were you sharing that somebody else had said that's some
19 place you should go?

20 A. Sharing. Yeah, I mean, I had no interest in a
21 strip club.

22 Q. Mm-hmm. Okay. Did -- what happened when you
23 got to that strip club?

24 A. It's hard for me to remember fully because I
25 kind of like disassociated almost, just from extreme

1 detail his plan for how the security team was going to
2 deal with Ina and David Steiner?

3 A. I believe so. Yeah.

4 Q. And there's -- there's a lot of evidence in this
5 case --

6 A. Mm-hmm.

7 Q. -- involving the Steiners and actions that the
8 eBay security team took against them. My questions
9 aren't going to focus so much on that.

10 But in general terms, did that plan involve
11 harassing the Steiners by sending them unwanted messages
12 and packages?

13 A. Yes.

14 Q. Did Mr. Baugh seem concerned about concealing
15 that plan?

16 A. Ye- -- yes, internally, yeah. Yeah.

17 Q. Okay.

18 A. Yeah.

19 Q. Did Mr. Baugh tell you that he had done similar
20 things in the past?

21 A. Yes. Yeah.

22 Q. Can you give examples or details about that?

23 A. I don't think he really gave details. He just
24 said this is something -- yeah, that he had done in the
25 past.

1 Steiners, did he direct you to use WhatsApp only for
2 those communications?

3 A. Not -- I don't think it was only on WhatsApp,
4 but it was, I would say, predominantly done via
5 WhatsApp.

6 Q. Okay. What other methods of communication were
7 being used for that plan?

8 A. I think some email, and the occasional, like,
9 iMessage. Yeah.

10 Q. Okay. Did -- so going back a little bit to June
11 of 2019, did Mr. Baugh, was that when Mr. Baugh
12 approached you about a project that he was working on
13 regarding the Steiners and gathering some information on
14 them?

15 A. Yes.

16 Q. Did that at first appear to you to be the type
17 of typical intelligence analysis project that you would
18 do in your routine work at eBay?

19 A. Yeah. Yeah. We would have persons of interest
20 that we would gather information on. Yeah.

21 Q. Okay. And that's throughout your time at eBay,
22 that was your understanding of part of your role there,
23 right, as an intelligence --

24 A. Yeah.

25 Q. -- analyst?

1 Q. All right. In mid-August 2019, did Mr. Baugh
2 ask you to go with him to Boston?

3 A. Yes.

4 Q. What explanation did he give you as to why you
5 needed to go?

6 A. Initially, it was still going with the idea that
7 they were getting paid by the activist investors, so
8 initially he approached it as looking like for flashes
9 of wealth, saying looking to see if they had an
10 expensive car in the driveway or something.

11 Q. Okay. And specifically, what explanation did he
12 give as to why you in particular needed to go?

13 A. Oh, because I -- we could use the PFC card to
14 book flights or cars, et cetera, et cetera. Yeah.

15 Q. Okay. So Mr. Baugh wanted you to use your PFC
16 credit card --

17 A. Mm-hmm.

18 Q. -- to book these flights rather than using eBay
19 as travel or an eBay card, right?

20 A. Mm-hmm.

21 Q. Okay. Did Mr. Baugh also come up with a cover
22 story for your trip to Boston?

23 A. Yes.

24 Q. And did you understand that he wanted you to use
25 that story to conceal your activities and make it look

1 like you had been doing something in Boston other than
2 what you were actually doing?

3 A. He told me initially it was in case other people
4 in security asked where I was going. He said that
5 what -- he called it, I think he called it the operation
6 was like need to know. So he said, "I know this is just
7 easier for you to explain to people."

8 Q. Okay.

9 A. So that -- yeah, that was the initial reasoning.

10 Q. Okay. And you and Mr. Baugh did travel to
11 Boston, correct?

12 A. Mm-hmm.

13 Q. And then you travelled to Natick, Massachusetts
14 where the Steiners lived?

15 A. Yes.

16 Q. And did you at that time surveil the Steiners in
17 a rented van?

18 A. Yes.

19 Q. While you were in Boston, did Michelle
20 Echevarria or Michelle Alford, did she quit?

21 A. Yes.

22 Q. What happened there?

23 A. I can't remember dates specifically, but a few
24 days into us being on the East Coast, he asked all
25 analysts to come out to the East Coast and -- or at

1 trapped.

2 Q. Were you comfortable with the things that
3 Mr. Baugh was asking you to do and directing you to do
4 against the Steiners?

5 A. No.

6 Q. While you were in Boston, did you receive
7 outreach from a police officer who was investigating
8 those actions against the Steiners?

9 A. Yes.

10 Q. Did Mr. Baugh instruct you to lie to the police
11 officers?

12 A. I don't know if he instructed me to. He told me
13 not to answer him or not meet with him. But then when
14 the police officer attempted to contact me again, I held
15 my phone up and showed it to Jim; and he just grabbed it
16 out of my hand and he answered it, and then he lied to
17 the police officer.

18 Q. Mm-hmm. Okay. And did you then come to learn
19 that eBay was conducting an internal investigation into
20 those actions? The action against the Steiners?

21 A. A little while later, yes.

22 Q. Okay. Did Mr. Baugh coach you on what to say in
23 your calls with eBay legal?

24 A. Yes.

25 Q. Did he instruct you to listen in on other

1 participants calls with eBay legal?

2 A. Yeah, I was in the same room at the time that
3 the call started and he just told us to stay,
4 essentially. Yeah.

5 Q. Did you ever observe Mr. Baugh delete any
6 evidence related to this -- these investigations?

7 A. Mm-hmm. Yes.

8 Q. What did he delete?

9 A. I don't -- I can't specifically remember the
10 full details at this point; but it was emails from my
11 laptop.

12 Q. Okay.

13 A. Yeah.

14 Q. In your sentencing letter, you described that
15 Mr. Baugh had you pull up an email submitting receipts
16 for gift cards, and that he deleted that email in front
17 of you.

18 Is that what happened?

19 A. Mm-hmm.

20 Q. You also said that he asked -- that he told you
21 to delete your WhatsApp messages to clear your phone of
22 confidential information?

23 A. Mm-hmm.

24 Q. Did he do that?

25 A. Yeah.

1 A. One moment. Let me read. Yes.

2 Q. And this is describing your time as an analyst
3 when you were working for Concentric Advisors. Did
4 these duties, did these remain your duties when your
5 employer shifted to PFC?

6 A. Yes, I think it was a little more -- it was more
7 expanded than this. This is a pretty small summary, I
8 would say.

9 Q. What -- what were some of the additional duties
10 that you had when you started working for PFC?

11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 Q. And during your time when PFC was your -- was
19 your employer, who was giving you your day-to-day duties
20 at eBay?

21 A. Stephanie Popp or Jim Baugh. And towards the
22 end of my employment, Stephanie Stockwell.

23 Q. Okay. You can put that exhibit aside.

24 A. Okay.

25 Q. Ms. Zea, are you familiar with the name

1

2

3

4

5

6

7

8

9

10 Q. And same question as before. Was this kind of
11 email within your normal job duties?

12 A. Yeah.

13 Q. Great. You can set that exhibit aside.

14 You discussed with Ms. Mills your use of a
15 credit card issued to you by PFC. I just wanted to go
16 over a few aspects of that.

17 A. Okay.

18 Q. You used the PFC credit card for a number of
19 purchases associated with the Natick events, correct?

20 A. Yes.

21 Q. That included airline tickets from San Francisco
22 to Boston for you, Baugh, and Stephanie Popp. Is that
23 right?

24 A. Yes.

25 Q. And it also included hotel rooms in Boston,

1 again, for you, Jim Baugh, and Stephanie Popp?

2 A. Yes.

3 Q. As well as the rental cars that you rented while
4 you were there?

5 A. Mm-hmm. Yes.

6 Q. You purchased these items with -- with the PFC
7 credit card at Jim Baugh's direction. Is that correct?

8 A. Yes.

9 Q. And I believe you told Ms. Mills that -- that
10 the reason Baugh told you to use the credit card was he
11 wanted to keep the charges off of eBay company credit
12 cards. Is that right?

13 A. Yeah, he said -- he essentially described it as
14 not having to put in requests or something to the eBay
15 travel site. I am not sure how it all worked, but yeah,
16 it was just easier or faster to use my card. Oh, I'm
17 sorry, and less people would -- it wouldn't be tracked
18 in the travel tracker app that tracked all employee
19 travel.

20 Q. Can you explain why he didn't want it tracked?

21 A. Similar to what I said earlier, where it was a
22 like need-to-know kind of thing. He didn't want other
23 people within security being nosy.

24 Q. So is it fair to say that Baugh was trying to
25 conceal the Boston trip from others within -- from

1 others within the security team?

2 A. Yes.

3 Q. Do you recall when you submitted your expense
4 report for the Boston trip to PFC?

5 A. No.

6 MR. BURKE: Objection.

7 MR. FEITH: I'm sorry, I didn't hear you.

8 MR. BURKE: Objection to form.

9 BY MR. FEITH:

10 Q. In the letter, you said -- in your letter, you
11 said that you submitted your final expense report a few
12 weeks after being fired by PFC. Is that right?

13 A. Probably. I don't remember off the top of my
14 head at this point. I can look.

15 Q. Okay. I want to shift gears and talk about the
16 trip to Boston. Did you have a cover story for that
17 trip? I'm sorry, I want to be just so the record is
18 clear: I'm talking about this is the trip to Boston in
19 mid-August of 2019?

20 A. Yes. Yeah, as I said earlier, Jim gave me like
21 a cover story.

22 Q. And what was the cover story?

23 A. That Dave Harville and myself were travelling to
24 some kind of security conference in Boston.

25 Q. And in your letter, you said that Baugh had you

1 A. I can remember two off the top of my head.

2 Q. And you were passed along for an interview at
3 eBay, correct?

4 A. Yes.

5 Q. What were you told about the hiring process
6 after you were screened by Concentric?

7 A. Can you be more detailed? I'm sorry.

8 Q. What did Concentric tell you that the screening
9 was for and what the next steps would be?

10 A. Oh, I think that there would be a background
11 check, and then that I was being offered a position
12 embedded at eBay.

13 Q. You weren't -- offered a position until after
14 you met at eBay, correct?

15 A. Correct.

16 Q. What were you told by Concentric before meeting
17 with eBay about the hiring process?

18 A. Oh, that I would be interviewing for a specific
19 job embedded at eBay, and that it was people working at
20 eBay that would, ultimately, decide to hire me. I am
21 realizing now though, Stephanie Popp did work at
22 Concentric Advisors at the time. She was embedded at
23 eBay though, and worked kind of as an agent for them
24 more than she did for Concentric, if that makes sense.

25 Q. So when you went through the screening process

1 me. I can't quite recall.

2 Q. You were living at home at the time?

3 A. Yes.

4 Q. Who were you living with?

5 A. My mom and dad.

6 Q. After you learned from Concentric that you got a
7 position embedded at eBay, what did you tell your
8 family?

9 A. That I was working as a contractor at eBay.

10 Q. Your first position was as an intelligence
11 operator, I think you said?

12 A. I believe so. Yeah.

13 Q. And at that time the name of the department
14 where you worked was Global Security Operations Center?

15 A. Yeah.

16 Q. And in July of 2017, I think you testified that
17 became the Global Intelligence Center, known as GIC,
18 correct?

19 A. Yes.

20 Q. Starting when the Global Intelligence Center was
21 created in July of 2017, your direct supervisor was
22 Stephanie Popp, right?

23 A. Yes.

24 Q. And then directly above her was Jim Baugh?

25 A. I believe so.

1 Q. In May of 2017, when you started at eBay, what
2 devices or equipment were you provided in order to
3 perform the duties of intelligence operator?

4 A. I -- no actual electronic devices. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 Q. You weren't issued any eBay mobile phone when
22 you first started, correct?

23 A. That's correct.

24 Q. Were you issued a mobile phone when you became
25 salaried?

1 A. Not initially. I think that came later.

2 Q. When you were issued a mobile phone --

3 A. Mm-hmm.

4 Q. -- it was issued by eBay, not any contractor
5 that you were an employee for, correct?

6 A. Yes.

7 Q. And when you got the mobile phone, were you an
8 employee of Concentric or PFC?

9 A. I believe -- hang on I need to think. Yeah,
10 Concentric, Concentric.

11 Q. When did you get a laptop?

12 A. I believe I was --

13 MR. UBHAUS: You mean an eBay laptop?

14 MR. BURKE: Well, that will be the next
15 question.

16 BY MR. BURKE:

17 Q. When -- when did you get a laptop associated
18 with your work at eBay?

19 A. I believe that would be sometime in 2018.

20 Q. Were you working for -- strike that.

21 Were you an employee of Concentric at the time
22 that you received a laptop?

23 A. Yes.

24 Q. And was the laptop issued by eBay?

25 A. Yes.

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 Q. You had a business card at some point, right?
9 A. No.
10 Q. There was no eBay issued business card for your
11 use?
12 A. No.
13 Q. There was some discussion about training this
14 morning and when you started with eBay, eBay provided
15 you with training, correct?
16 A. Yes.
17 Q. Did you ever have any training by Concentric
18 during the period of time you were a Concentric
19 employee?
20 A. Yes.
21 Q. What were the subject matters that you were
22 trained on by Concentric?
23 A. Intelligence gathering, I remember. I remember
24 doing something with how -- how to know a source was a
25 reliable source. I cannot specifically recall anything

1 A. Okay. Yes. Yeah, I'm sorry, I thought you
2 meant as an organization on a whole. Yes, employees of
3 eBay would carry on training or educational sessions,
4 yeah.

5 Q. And how frequently did that occur?

6 A. In an unofficial capacity of training, almost
7 daily.

8 Q. And as you sit here today, you -- you can think
9 of two training sessions that were run by Concentric
10 during your time when you were a Concentric employee?

11 A. Yes, I can't fully remember the specifics, but I
12 do remember them coming to the office and doing
13 something with us, yeah.

14 Q. As part of the training that eBay did within the
15 security center, it included the processes and
16 procedures that eBay wanted you and other analysts to
17 follow as to security threats, correct?

18 A. Yes.

19 Q. It included on how eBay wanted reports and
20 paperwork done and recorded, correct?

21 A. Yes. Yeah.

22 Q. Sometimes Ms. Popp or Mr. Baugh would have you
23 travel for training, correct?

24 A. Yes.

25 Q. In fact, there was one multi-day program that

1 you did in Austin?

2 A. Mm-hmm.

3 Q. Right? Did Concentric ever direct you to travel
4 some place to have training?

5 A. No.

6 Q. Did you ever report back to either Concentric or
7 PFC that you were travelling for training purposes?

8 A. No.

9 Q. Did you receive handbooks, manuals, or other
10 documents upon your start with eBay informing you how to
11 do your job, [REDACTED]

12 [REDACTED]

13 A. I remember a reference binder for the GSOC on
14 how to escalate certain things or like a training
15 checklist, but it wasn't a manual or a handbook per se.
16 It was more just making sure the -- the verbal training
17 occurred properly.

18 Q. Any other handbooks, manuals, or other documents
19 other than the -- what you just described, the reference
20 binder?

21 A. Not that I recall.

22 Q. Were you ever provided any handbooks or manuals
23 by Concentric or by PFC informing you about how to do
24 your job at eBay?

25 A. No.

1 Q. When you started, your initial salary was --
2 strike that.

3 You testified that when you started, you were an
4 hourly employee?

5 A. Yes.

6 Q. Correct? And was there some annual equivalent
7 what you expected to earn when you first started?

8 A. I think it would have been about \$52,000 a year.
9 I am not a math person. Like --

10 Q. And then in July of 2017, you were promoted to
11 intelligence analyst when the GIC was created?

12 A. Yes.

13 Q. At that time you were put on an annual salary?

14 A. Mm-hmm.

15 Q. You do need to articulate the word.

16 A. Oh, yes, I'm sorry.

17 Q. And what was the annual salary set at?

18 A. I think \$70,000.

19 Q. Do you recall when your next salary increase or
20 promotion was after July of 2017?

21 A. I -- I don't know definitively. Yeah. I don't
22 know definitively.

23 Q. What's your best recollection of the next
24 promotion or salary increase that you received?

25 A. I think there -- one occurred shortly after more

1 analyst?

2 A. No.

3 MR. UBHAUS: I'm sorry, I just want to clar- --
4 the last question. At some point, you were promoted to
5 the position of senior analyst, yes. And that was in
6 late August of 2019, after the events that people here
7 have referred to as the "Natick events"?

8 THE DEPONENT: Yeah -- oh, no, it was during the
9 Natick events.

10 MR. BURKE: Okay.

11 THE DEPONENT: Yes. Sorry.

12 MR. BURKE: So --

13 MR. UBHAUS: So --

14 THE DEPONENT: I don't -- I don't think they put
15 it in writing or anything until after.

16 BY MR. BURKE:

17 Q. What were you verbally told about the promotion
18 to senior analyst, and when?

19 A. Jim Baugh just told me that they were increasing
20 my salary again, while we were in Boston. And then he
21 said it would -- it would come with a title change, but
22 it did not sound like increased responsibilities or
23 anything like that.

24 Q. And that happened while you were in Boston with
25 Mr. Baugh?

1 A. Yeah.

2 Q. What was the title that you had before he
3 informed you that he was going to make you a senior
4 analyst?

5 A. Intelligence analyst.

6 Q. So you -- you went from being an intelligence
7 operator to intelligence analyst to senior analyst,
8 correct?

9 A. Yes.

10 Q. And all of those promotions were dictated by
11 your supervisors at eBay, right?

12 A. Yes.

13 Q. You didn't have any -- you didn't do anything
14 with Concentric or PFC in order to obtain a new job
15 title?

16 A. That's correct.

17 Q. Throughout your tenure working at eBay, you
18 received your daily directions, supervision, and
19 assignments from your eBay supervisors within the Global
20 Intelligence Center or the GIC, whichever it was called
21 at that time, right?

22 A. Yes.

23 Q. Concentric never at any time directed,
24 supervised, controlled, or instructed you as to any of
25 the work you performed for eBay, correct?

1 A. Correct.

2 Q. And you consented to become an employee --
3 strike that.

4 You consented to be embedded with eBay when you
5 first became an employee of Concentric, right?

6 A. Yes.

7 Q. You never asked Concentric for an assignment to
8 another client at any time during your employment by
9 them in 2017 or 2018?

10 A. Correct.

11 Q. I am going to ask you some questions about the
12 period toward the end of 2018, when eBay was terminating
13 Concentric's contract and PFC came on board, okay?

14 A. Okay.

15 Q. Or actually before we get there, the team
16 delivered to you a gift to your room at the Wailea Beach
17 Resort in October of 2018.

18 Do you recall that?

19 A. Yeah.

20 Q. What was up with that?

21 A. I don't know. It was like an intrusion on my
22 vacation. I don't know how they found out what room I
23 was in, but yeah, I was on vacation with a friend, and
24 either we came home and -- I think we came back to the
25 hotel room, and there was champagne and maybe flowers.

1 A. He indicated as much later on, saying what I
2 think I also mentioned earlier, that he wanted to
3 refocus the priorities of that team and wanted to hire
4 people that aligned with that vision more.

5 Q. And you understood that he had the discretion to
6 fire people on the team that he wished to fire?

7 A. Yeah.

8 Q. And like the hiring of you, he had discretion
9 about who he wanted to hire as well, correct?

10 A. I believe so, yeah.

11 Q. When Mr. Baugh told you and others on the team
12 about the termination of the contract with Concentric
13 Advisors, he told you that you would continue to work
14 for eBay, but now paid by PFC instead of Concentric,
15 right?

16 A. Yes.

17 Q. Other than that, you were told that everything
18 about your job was going to remain exactly the same,
19 correct?

20 A. Yes.

21 Q. You were told that you were still going to
22 report to your same eBay supervisors, right?

23 A. Yes.

24 Q. You had talked about a meeting to sign the
25 contract where you were alone with two people from PFC?

1 Q. PFC didn't start to pay you until they came on
2 board on January 1st, 2019, right?

3 A. I think so, yeah. I just don't -- I -- if
4 that's the onboarding date, then yes. I just don't
5 remember the specific dates.

6 Q. Did PFC issue any devices or equipment for you
7 to perform your job duties at eBay?

8 A. No.

9 Q. And after PFC took over the contract on
10 January 1st, 2019, you still received your daily
11 direction, supervision, and assignments from your eBay
12 supervisors, correct?

13 A. Yes.

14 Q. PFC did not at any time direct, supervise,
15 control, or instruct you as to any of the work you
16 performed for eBay, correct?

17 A. Yes.

18 Q. You are agreeing with that statement, right?

19 A. Yes, mm-hmm.

20 Q. And you would agree that -- would the statement
21 that while you were performing your work for eBay you
22 never reported back to PFC exactly what you were doing?

23 A. Yes.

24 Q. Did you --

25 A. I -- I'm sorry. Sometimes they would come to

1 Q. -- eBay?

2 A. Yeah. Yeah.

3 Q. Did you ever -- strike that.

4 To your knowledge, did PFC access any reports
5 that you created other than your expense reports?

6 A. No.

7 Q. Did you ever seek approval for travel from PFC?

8 A. No.

9 Q. Did anyone at PFC ever give you a performance
10 review?

11 A. No.

12 Q. Did anyone at eBay ever give you a performance
13 review?

14 A. Yes.

15 Q. How often?

16 A. I can only remember one, and it wasn't really in
17 an official capacity. There were -- I don't recall
18 there being any documentation or it was just like a
19 sit-down, that I can remember.

20 Q. Do you recall filling out a self-evaluation form
21 as part of your evaluation at eBay?

22 A. No.

23 MR. BURKE: Can we mark this, it would be --

24 MR. UBHAUS: 7.

25 (Exhibit No. 7 marked for identification.)

1 MR. BURKE: I'm sorry. I only have one extra
2 copy.

3 BY MR. BURKE:

4 Q. Ms. Zea, I have handed you as Exhibit 7 what's
5 Bates stamped as EBAY_STEINER_34051 through 54.

6 A. Mm-hmm.

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED]

9 [REDACTED] [REDACTED]

10 Q. And just to be clear: You were never evaluated
11 by Concentric or PFC?

12 A. No.

13 Q. My statement is, correct?

14 A. Yes, I'm sorry.

15 Q. I apologize, that's my fault, not your fault.

16 And I'm sorry if I asked you this before, but
17 you had no PFC-issued property or equipment during your
18 tenure of being employed by PFC, correct?

19 A. Correct.

20 Q. Just the credit card?

21 A. Oh, yes.

22 Q. So there are some people who are either
23 terminated from GIC or who resigned, and I just want to
24 go through some of their names and ask you a question
25 about each one. Lauren Ticknor-Squires, did -- was she

1 switched.

2 Q. Stephanie Stockwell, she was --

3 A. She was terminated, along -- she was an eBay
4 employee, terminated following the Natick events.

5 Q. Okay. I would like to ask you if you would
6 agree with a statement. Would you agree that Concentric
7 while you were a Concentric employee and PFC while you
8 were a PFC employee were merely performing
9 administrative functions such as payroll, processing
10 expenses, and tracking your PTO, and not in any way
11 directing or controlling the work you performed for
12 eBay?

13 A. Correct. Yeah.

14 Q. As to the Natick events, all of your actions
15 were at the direction and instruction of your eBay
16 supervisors, particularly Mr. Baugh, correct?

17 A. Correct.

18 Q. It was your eBay supervisor Mr. Baugh who
19 directed and required your attendance at meetings when
20 the campaign against the Steiners was discussed and
21 decisions were made about sending them various
22 paraphernalia, right?

23 A. Yes.

24 Q. And it was your eBay supervisor Mr. Baugh who
25 instructed and directed you to keep the actions and

1 conduct from others, including others in the security
2 department, and others at eBay, right?

3 A. Correct.

4 Q. And it was your eBay supervisor Mr. Baugh who
5 instructed and directed you and others to use prepaid
6 debit cards to make online orders, right?

7 A. Yes.

8 Q. And your eBay supervisor Mr. Baugh was the one
9 that instructed people to use anonymous email accounts,
10 virtual private networks, cell phones, and specifically
11 purchased computers as part of the campaign against the
12 Steiners, right?

13 A. Yes.

14 Q. PFC never instructed or directed your actions in
15 ordering scary masks, live insects, or other items as
16 part of the Natick events, correct?

17 A. Yes.

18 Q. And it was your eBay supervisor, mainly
19 Mr. Baugh, but also Ms. Popp, who instructed and
20 directed your actions in Boston when you traveled there
21 as part of the campaign, right?

22 A. Yes.

23 Q. PFC never instructed or directed your actions in
24 Boston as part of the campaign against the Steiners?

25 A. Correct.

1 Q. It was your eBay supervisor Mr. Baugh who
2 instructed and directed you not to speak to the Natick
3 Police Department or meet with them when they contacted
4 you, right?

5 A. Correct.

6 Q. PFC had nothing to do with that, right?

7 A. Right.

8 Q. It was your eBay supervisor, Mr. Baugh, mostly,
9 and to some extent, Ms. Popp, who instructed you to make
10 false statements about what occurred in Boston after
11 facts regarding the campaign started to come to light,
12 correct?

13 A. Yes.

14 Q. PFC didn't direct you to make false statements
15 about the Natick events to anyone, did they?

16 A. They did not.

17 Q. Did you make false statements to law enforcement
18 during any part of the investigation into the events in
19 Natick?

20 A. No.

21 Q. When you met with the US Attorney's Office,
22 making the first proffer, everything was honest at that
23 time?

24 A. To my recollection.

25 Q. You never informed PFC during the events in

1 Natick of your eBay supervisor's instructions regarding
2 the Natick events?

3 A. Can you repeat that? I'm sorry.

4 Q. Yeah. While things were happening regarding the
5 Natick events in August of 2019 --

6 A. Mm-hmm.

7 Q. -- you never told anyone at PFC about it?

8 A. Correct.

9 Q. You never asked PFC permission to check the
10 address of any persons of interest in the Boston area,
11 correct?

12 A. Correct.

13 Q. You did not seek or receive permission from PFC
14 to go to Boston at all, did you?

15 A. Correct.

16 Q. Now, you described earlier your conversation
17 with your colleague Michelle after you came back from
18 purchasing some gift cards, where you were expressing
19 some concern about things on the list to be sent to the
20 Steiners.

21 Do you recall that testimony?

22 A. (Moves head up and down.)

23 Q. Was that the first time that you had concern
24 about what was happening with regard to the Steiners?

25 A. No, but that was the first time where it was --

1 A. I was uncomfortable doing surveillance full
2 stop.

3 Q. Okay. Given that discomfort, did you report
4 anything back to PFC?

5 A. No.

6 Q. You had your own room in Boston, correct?

7 A. Yes.

8 Q. You had a lot of time where you had privacy,
9 right?

10 A. Yes.

11 Q. You could have called PFC at any point from your
12 hotel room and asked for guidance, right?

13 A. Sure, yeah.

14 Q. And you -- you didn't do that because of the
15 prior experience with Concentric, where a complaint got
16 back to Popp and Baugh?

17 A. Partially. Yeah. It was -- yeah, overall just
18 I guess complete fear that Jim Baugh would find out in
19 some way or another.

20 Q. After Michelle left, why didn't you call
21 Michelle and say, I am really uncomfortable with what's
22 happening, would you drop a dime with PFC. Don't
23 mention me. You are no longer employed by eBay, get me
24 some help?

25 A. I just didn't think about that.

1 investors.

2 Q. After the events in Natick were starting to be
3 investigated by the police, you were interviewed by eBay
4 lawyers and a representative PFC was on the call.

5 Do you recall that?

6 A. Oh, yeah.

7 Q. And -- and you acknowledged earlier that you
8 were not truthful about the events in Natick at that
9 time, correct?

10 A. Correct.

11 Q. So you not only lied to eBay lawyers, but you
12 lied to your employer PFC about the events in Natick?

13 A. Well, PFC didn't ask me any questions. They
14 were just on the phone while I was speaking to eBay
15 legal.

16 Q. So you considered that you were only lying to
17 eBay lawyers because that was the person --

18 MR. UBHAUS: Objection. Objection. That's
19 argumentative.

20 BY MR. BURKE:

21 Q. -- because that was the person asking the
22 questions?

23 You can go ahead and answer. Your lawyer's
24 objection is on the record.

25 A. Oh. Yeah, I -- I guess I didn't fully consider

1 it lying at the time. I mean, it was but it -- I viewed
2 it as part of my job. I don't know how to describe
3 that.

4 Q. As an employee of PFC embedded with eBay, is
5 there anything that PFC did that caused you to commit
6 the acts for which you were convicted?

7 A. No.

8 Q. As the employee of PFC embedded with eBay, is
9 there anything that PFC failed to do that caused you to
10 commit the acts for which you were convicted?

11 A. No.

12 Q. Do you understand that the acts to which you
13 were convicted were outside the scope of your job duties
14 as an intelligence analyst?

15 A. In hindsight, yes.

16 Q. Mr. Baugh was very aggressive about this
17 mission, the Natick events, right?

18 A. Yes.

19 Q. It had been a hot topic for months, and getting
20 hotter and hotter as you approached August of 2019,
21 correct?

22 A. Yes.

23 Q. Did you have the sense from Mr. Baugh that if
24 you had resigned, the harassment campaign would have
25 stopped?

1 A. No.

2 Q. Did you have the sense that if you resigned, the
3 trip to Boston would not have happened?

4 A. No.

5 Q. Do you have the sense that if you had told Baugh
6 that you would not use the PFC credit card for funding
7 the airline trips for him and others, that the trip
8 would not have occurred?

9 A. Yeah.

10 Q. Yes, that the trip would not have occurred or
11 yes, it would have gone forward anyway?

12 A. The trip would not have occurred. Or that's the
13 sense I had at the time.

14 Q. And how come?

15 A. I don't know. I don't know that they would have
16 used their company cards to do it.

17 Q. What about using their personal cards and
18 seeking reimbursement later?

19 A. I think one of them did do that. I think Dave
20 Harville did, so yeah, maybe they would have carried on.
21 I can't say for sure.

22 Q. So -- so Dave Harville is an example of someone
23 that went to Boston to conduct criminal activities, even
24 though he didn't use the PFC card through you?

25 A. Yeah, I guess so.

1 Q. Were there other supervisors at that same level
2 other than Popolizio?

3 A. Yes.

4 Q. Who else?

5 A. Madeline Atkinson.

6 Q. Did you ask her to report the situation with the
7 night shift co-worker to Concentric?

8 A. Not specifically.

9 Q. Okay. But you learned that she reported it to
10 Popp and Baugh, correct?

11 A. Correct.

12 Q. And Popp and Baugh told you never to go to
13 Concentric again, about any issues you had at eBay,
14 right?

15 A. Yes.

16 Q. Did you ever go to anyone at Concentric about
17 the janitor trying to kiss you?

18 A. No.

19 Q. In the spring of 2019, you received a promotion,
20 correct?

21 A. Yes.

22 Q. And in addition to the -- being asked for a
23 promotion, you were asked to participate in creating a
24 job description and interviewing candidates, correct?

25 A. I am trying to recall. Yes. Yes.

1 MR. BURKE: Can we mark the next exhibit,
2 please. It will be No. 8.

3 (Exhibit No. 8 marked for identification.)

4 (Discussion off the record.)

5 BY MR. BURKE:

6 Q. Ms. Zea, I have handed you Exhibit 8, which is
7 Bates stamped EBAY_STEINER_43986 through 988.

8 A. Mm-hmm.

9 Q. Do you recognize this?

10 A. Yeah.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 A. Hang on.

1 Q. Do you see that?

2 A. Oh, yes, I'm sorry. Yes.

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 Q. Did you have any conversation with anyone at PFC
13 about their experience in embedding intelligence
14 analysts?

15 A. No.

16 Q. You were relying upon what Jim Baugh had
17 described for you back at the time that he terminated
18 the Concentric contract?

19 A. Yes. I -- I would like to go back. I -- I
20 don't think at this time I had a promotion. Sorry.

21 Q. Okay.

22 A. I -- there was a small period of time where
23 without asking me first, Jim promoted me to supervisor
24 or something, and, like, two weeks later,
25 unceremoniously fired me in front of everyone from the

1 position. It didn't come with any pay raise or
2 anything. It was very weird.

3 Q. So when did that take place?

4 A. Before Stockwell -- Stephanie Stockwell became
5 -- whatever her title was when she was promoted. Around
6 this time. I believe at this time, she was above me.
7 And towards the end of May, she was promoted -- hired as
8 an eBay employee.

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 provided full-time classified security and intelligence
13 analysts embedded with NASA on a PFC contract?

14 A. Yeah. I did not know that though.

15 Q. Were you aware that PFC provided a full-time
16 security assessment specialist with the Discovery Land
17 Company?

18 A. No.

19 Q. Were you aware that prior to 2019, PFC operated
20 a full-scale, full-time intelligence operation center.
21 That serviced executive security, corporate security,
22 and private family security intelligence needs for
23 numerous clients?

24 A. No, I didn't know that.

25 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. And at this point, you are not real happy at
7 eBay, right?

8 A. Correct.

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 was -- I felt trapped and, like, I couldn't reach out to
17 anyone.

18 BY MR. BURKE:

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 Q. You testified this morning about going to a
13 strip club in Las Vegas during an eBay Open, correct?

14 A. Yeah.

15 Q. And that was in -- strike that.

16 Did you go to the eBay Open in July of '18 as
17 well?

18 A. No.

19 Q. Okay. So you just -- your first time going was
20 July of '19?

21 A. Yes.

22 Q. And you had testified this morning that when one
23 colleague mentioned going to the Spearmint Rhino, that
24 you repeated it.

25 Do you recall that testimony?

1 Concentric credit card.

2 Q. Okay. So during the time that you were an
3 employee of PFC, every month you would go through this
4 process of preparing a spreadsheet and sending it in to
5 PFC with your -- the receipts?

6 A. Yes.

7 Q. How did the process happen for you to get
8 approval from your eBay supervisors before you sent it
9 to PFC?

10 A. I would have emailed it, a copy to them. Yeah.

11 Q. And would you get approval from them to send it
12 to PFC or would you just do it at the same time?

13 A. I don't recall specifically.

14 Q. When you sent them to PFC, would you use your
15 eBay email account or your PFC email?

16 A. I think my eBay one.

17 Q. Are there times that you would pay for expenses
18 using your PFC credit card and other times that you
19 would pay out of pocket and later seek reimbursement?

20 A. I think if I forgot my PFC credit card or
21 something to that effect, yeah.

22 Q. That would be the only time that you would use
23 cash, is if you did not have the PFC card on you?

24 A. That or if they didn't accept credit card or
25 something. Or if Jim instructed me for whatever reason.

1 replied once more to Stephanie Popp on page 1, saying:

2 "Just to clarify, it was never sent?"

3 So I believe I was under the impression that
4 Popp had sent it and told me that it was it approved by
5 Dan Corey. And that is the assumption I was working
6 under when I emailed Scott Pugh.

7 BY MR. BURKE:

8 Q. Okay. So now that you have looked at
9 Exhibit 10, it -- you don't believe it was you yourself
10 that sent the -- your final expense report to PFC, but
11 you wrote that because you believe Ms. Popp sent it?

12 A. Yes.

13 Q. And -- and would you agree with me that this
14 email exchange also includes changing things on your
15 expense report to hide things?

16 Look at the second email down from Stephanie
17 Popp to the two of you, dated October 3rd.

18 A. Mm-hmm. I see that.

19 Q. Do you see Stephanie is telling you, quote:

20 "Rony, I don't think you should include the
21 receipt of Dick's Sporting Goods since it has itemized
22 items."

23 A. Oh, yes.

24 Q. "I think you should mark it as, quote, 'cash
25 withdrawal' -- close quote -- or find a receipt of

1 something else of the same value."

2 Do you see that?

3 A. Yeah.

4 Q. So this is still a continuing attempt to hide
5 the events in Natick, right?

6 A. Yeah, it looks like it.

7 Q. And by this time you are not an employee of PFC
8 anymore or embedded at eBay, right?

9 A. Right.

10 Q. And why are you still trying to hide things at
11 this point, if you are no longer working for Jim Baugh?

12 A. I think he was still saying it was something
13 that eBay was going to handle, but yeah, I can't speak
14 definitively.

15 (Exhibit No. 11 marked for identification.)

16 THE DEPONENT: Oh.

17 BY MR. BURKE:

18 Q. Ms. Zea, for the record, you have been handed
19 Exhibit 11, which is Bates-stamped
20 EBAY_STEINER_135239 --

21 A. Mm-hmm.

22 Q. -- through 287.

23 A. Yes.

24 Q. If you turn to the page Bates-stamped 255.

25 A. Oh, I see.

1 Q. Do you see that?

2 A. Yeah.

3 Q. Is that your expense report for expenses
4 incurred in August of 2019?

5 A. Yes.

6 Q. And -- and do you believe that this is the
7 expense report that you submitted to PFC?

8 A. I think so.

9 Q. And if you look at item No. 12 on the
10 spreadsheet, there is a cash withdrawal for \$125?

11 A. Mm-hmm.

12 Q. Correct?

13 A. Yeah.

14 Q. And that's consistent with the reference of
15 eliminating the Dick's Sporting Goods receipt, which was
16 also \$125 item, correct?

17 A. Yes.

18 Q. And did you physically -- strike that.

19 You physically sent this to Scott Pugh to seek
20 reimbursement, having made that change to hide something
21 on your expense report, correct?

22 A. Yes.

23 Q. And you were doing that at the direction of your
24 former eBay supervisors, Stephanie Popp and Jim Baugh,
25 right?

1 A. Yes.

2 Q. This morning you testified that you were
3 terminated by PFC?

4 A. Mm-hmm.

5 Q. Correct?

6 A. Yes.

7 Q. Before you were terminated by PFC, you were
8 terminated by eBay, correct?

9 A. I was put on leave. Yeah. Paid leave.

10 Q. So -- so tell me how that came about.

11 A. Jim Baugh told me that the eBay attorneys were
12 trying to make it appear as though I went rogue and did
13 stuff in Natick of my own volition. And that they were
14 trying to pin it all on me and so he said to prevent me
15 from having to speak with counsel that they hired, he
16 was going to have PFC put me on paid leave. Yeah.

17 Q. What was the next thing that happened with
18 regard to the status of your work at eBay or your being
19 an employee of PFC, after you were informed by Jim Baugh
20 that you were being suspended with pay?

21 A. I travelled to Las Vegas to meet with PFC team
22 members and an attorney. And Jim told me that the
23 attorney was to represent me in this situation and then
24 I found out they weren't. And so I gave them
25 information about what happened, and then went home, and